

INTERNATIONAL MILITARY TRIBUNAL FOR THE FAR EAST

THE UNITED STATES OF AMERICA, et al

-vs-

ARAKI, Sadao, et al

SWORN DEPOSITION

Deponent: TOTSUKA, Michitaro  
born: April 21st, 1890  
No. 17 NAKA-Machi NAKANO-ku, Tokyo

Having first duly sworn an oath as on attached sheet and in accordance with the procedure followed in my country I hereby depose as follows:

I was appointed Commander of the Third Combined Air Corps in July 1937. The abovementioned air corps was stationed in Taihoku, Formosa and QUELFERT ISLAND.

On August 14, 1937, the Chinese Air Corps carried out an attack on the cruiser "IZUMO" in Shanghai Harbor as well as the Marine Headquarters. In retaliation, we bombed the Chinese Air Base in Nanking on August 15, 1937. In the early part of September 1937, the Chinese air strength was transferred southward to Canton and they bombed the cruiser "YUBARI" on the South China coast. We therefore bombed the Air Base in Canton in an attempt to wipe out the Chinese Air Force.

Subsequently we undertook the destruction of railways and communications after receiving reports that the Chinese Army was moving northward.

We received instruction and orders from the Third Fleet as to the objectives to be bombed. Those instructions were to bomb only airfields,

arsenals, military installations, munition dumps, military <sup>0</sup>schools, and other military targets. At no time did we bomb any city or town indiscriminately without a military objective in view.

The air corps had reconnaissance planes bringing in reports and we consulted our maps for objectives to be bombed. We made use of aerial photographs in an effort to bomb accurately.

Of course, on occasion we did not succeed in scoring a direct hit on our targets and some unavoidable accidents occurred. At times the Chinese anti-aircraft was extremely effective and we were forced to fly at high altitudes over our objectives. As soon as we bombed, we took photographs and studied the results of our bombing for the purpose of achieving greater accuracy. We never at any time intentionally bombed non-military objectives or installations. On any occasion when we failed to achieve accurate bombing and damaged some non-military installations, we were warned by the General Staff to exercise more care. I constantly instructed the pilots and commander to exercise caution in their bombing missions. On some occasions, when we suspected even though we suspected the Chinese were displaying the flag of a third power, we refrained from bombing in order to be doubly sure. Giving an example here, in August 1938 when the Chinese soldiers were fleeing up the Yangtze River from Hankow, and just as our planes were about to bomb, a French flag was hoisted on the ship which we knew for sure they were on, therefore our planes returned without bombing. There were other cases similar in nature and although we knew the Chinese <sup>were</sup> hiding behind a foreign flag, our men were instructed to refrain from bombing because of the possibility of being mistaken.

In some instances of our bombing missions, we would not use the bomb

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sight, and resorted to the hand-operated device and a stop watch in order to make certain of our target before releasing the bombs.

The pilots were initially furnished maps by the General Staff for the purpose of determining military objectives and showing general location of the third power <sup>installations. maps</sup> indicating installations of the third powers based on informations, <sup>maps</sup>, furnished directly by the third powers were distributed later for our guidance. Therefore, it greatly aided us in directing our attacks on enemy positions and installation only.

On this 15th day of April 1947

at Tokyo

DEPONENT TOTSUKA, Michitaro (seal)

I, INAGAWA, Tatsuo, hereby certify that the above statement was sworn by the Deponent, who affixed his signature and seal thereto in the presence of this witness.

On the same date  
at Tokyo

Witness: (signed) Tatsuo Inagawa

O A T H

In accordance with my conscience I swear to tell the whole truth with-holding nothing and adding nothing.

TOTSUKA Michitaro

Translation Certificate

I, KENJIRO Akune , of the Defense, hereby certify that the attached translation of Affidavit of TOTSUKA, Michitaro is, to the best of my knowledg, and belief, a correct translation and is as near as possible to the meaning of the original document.

Kenjiro Akune

Tokyo, Japan

Date 17 April 1947